

Attachment 2  
ACCWP Comments on Reporting Requirements of Revised Draft Municipal Regional Permit  
April 3, 2009

Provision	Provision Heading	Issue	Requested Change
Reporting	General	<p>Preparation of the annual report will require significant efforts to coordinate and compile information from multiple staff from different departments. The level of effort grows exponentially with each piece of data required in the annual report.</p> <p>The effort put into completing the reports may not be fully appreciated by Water Board staff. Board consideration of these requests for reduction in the breadth and depth of reporting requirements will have a significant positive impact on the staff resources needed to comply with reporting requirements, and will free up considerable staff time for other activities required under the permit.</p>	Revise reporting requirements as described below and in the Program's comment letter.
<b>Provision C.2: Municipal Operations</b>			
C.2.d(iii)	Pump Stations	Reporting on the levels of trash and debris removed from the pump stations unnecessary. If this information is needed for a specific purpose, a one-time assessment would suffice.	Delete the requirement to collect and report on trash and debris removed from pump stations.
<b>Provision C.3: New Development and Redevelopment</b>			
C.3.b(v)(1)	Annual Reporting, Projects	Reporting requirements are overly detailed	Eliminate categories of data, or make listing optional if not appropriate (such as street addresses that may not exist for new subdivisions), cross streets if an address is given, application date (approval date should be sufficient)
C.3.b.v.(1)(d)	Reporting	The reporting requirements for regulated projects include total area of land	<u>Remove requirement for reporting area of land disturbed.</u> These data have no relevance to

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		disturbed.	Regulated Projects for post-construction stormwater management. Collecting these data is unnecessary and cumbersome.
C.3.v.(2)	Reporting	Permittees shall report the capital costs, operation and maintenance costs, and legal and procedural arrangement in place to address the management of completed Green Street Pilot Projects.	<u>Eliminate Green Streets Reporting Requirement.</u> This is a cumbersome and non-essential reporting task; and therefore, should be eliminated. Green streets projects will be reported in the Table of New Development projects, as required in C.3.v(1).
C.3.b(v)(2)	Annual Reporting, Green Streets	Reporting overly detailed, much data is not relevant to water quality	Report on status only (design, construction, complete) only until project is complete; only report on O&M provisions if entity other than City is responsible, eliminate cost reporting
C.3.c(iii)	Implementation Level, LID	Reporting of implementation efforts is redundant with reporting under C.3.b(v)(1), which demonstrates LID elements of each approved project. Reporting is also redundant with ongoing reporting to Board staff regarding use of vault-based treatment measures	Eliminate requirement
C.3.e(iv)	Alternate Compliance	Reporting on legal authority/ procedural changes provides no value	Eliminate requirement
C.3.f(iii)	Alternative Certification	Reporting on who conducted a plan review is overly prescriptive; city engineer's approval of plans should be evidence of adequate plan review	Eliminate requirement
C.3.g(iv)	HM	Reporting is redundant with reporting under C.3.b(v)(1)	Eliminate requirement
C.3h(iv)(3)	O&M	Reporting on inspections is redundant with C.3h(iv)(1)	Eliminate requirement; any issues should be reported in C.3h(iv)(1)
C.3.i(iii)	Small Projects	Reporting on this material provides nominal benefit to water quality	Eliminate requirement

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<b>Provision C.4: Industrial and Commercial Discharge Control</b>			
C.4.b.ii.(6)	Record Keeping	The record keeping listed under this section is not as comprehensive as the recordkeeping required under the Enforcement Response Plan (C.4.c.ii.(4)). All of the inspection related record keeping should be listed in one place in this section and not be listed in different places and expressed in different ways.	Consolidate all of the recordkeeping requirements in this section.
C.4.b.iii.	Reporting	The annual reporting requirements listed under this section are not as comprehensive as the annual reporting required under the Enforcement Response Plan (C.4.c.iii). All of the annual reporting should be listed in one place in this section. It is uncertain what the purpose is of including language about the percent of violations resolved within 10 working days or in a timely manner.	Consolidate all of the annual reporting requirements in this section. If there are annual reporting items that merit additional discussion and consideration, these should be worked out following adoption of the MRP.
C.4c(iii)	ERP	Requirement for reporting on inspection results is redundant with C.4b(iii)	Eliminate requirement
C.4d(iii)	Staff Training	Reporting % of staff attending training is not of value and difficult to calculate	Modify requirement
<b>Provision C.5: Illicit Discharge Detection and Elimination</b>			
C.5.e(iii)	Collection Screening	Inspections and reporting are redundant with C.2, C.8, and C.10	Eliminate Requirement
C.5.f(ii)	Tracking and case follow up	Record keeping requirements are overly detailed	Allow agency to determine means of tracking incidents; annual reporting will indicate number of unresolved issues, if any
<b>Provision C.6: Construction Site Controls</b>			
C.6.a(iii)	Legal Authority	Reporting is not of value	Eliminate requirement
C6.e(iii)	Inspections	Reporting requirements are overly detailed	Provide flexibility in reporting as needed to track and correct problem sites

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C.6.ii.(4)	Implementation Level; Tracking and Reporting	The electronic database or tabular format shall record the following information:	If the requirement to report on individual inspections is not replaced with a requirement to report on a total number with summary information (see above), then <u>reduce the data that must be reported</u> . The “inches of rain since last inspection” is particularly unreasonable and cumbersome to implement.
C.6f(iii)	Staff training	Reporting % of staff attending training is not of value and difficult to calculate	Modify requirement
<b>Provision C.7: Public Information and Outreach</b>			
C.7.e(iii)	Public Outreach Events	Reporting requirements are overly detailed	Revise requirements to just the facts and eliminate guessing at effectiveness
C.7.f(iii)	Watershed Stewardship	Reporting requirements are overly detailed and may be redundant with reporting by other groups	Limit reporting to listing the activity or group which the Permittee supports. Consolidate this reporting with C.7e(iii)
C.7.g(iii)	Citizen Involvement Events	Reporting requirements are overly detailed	Revise requirements to just the facts and eliminate guessing at effectiveness
C.7h(iii)		Reporting requirements are overly detailed	Revise requirements to just the facts and eliminate guessing at effectiveness
<b>Provision C.9 Pesticide Toxicity Control</b>			
C.9.b(iii)	IPM Implementation	Reporting requirements are overly detailed	Revise to allow a qualitative instead of quantitative discussion of IPM efforts
C.9.c(iii)	Staff Training	Reporting % of staff attending training is not of value and difficult to calculate	Modify requirement
C.9.d(ii)	Contractor Compliance	Does the Board <u>really</u> want copies of our standard specs and individual contracts? The additional attachments will further complicate permit submittal	Eliminate submittal of documents and allow agencies to summarize IPM requirements
C.9.e(ii)	Track regulatory process	This requirement is inappropriate to put in a stormwater permit. Pesticide regulation is beyond the jurisdiction of local agencies. The Board should be providing	Eliminate requirement

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		input on these issues to the appropriate State and Federal agencies that regulate pesticides.	
<b>Provision C.10: Trash Reduction</b>			
C.10.b	Hot Spot Assessment	Overly detailed reporting.	Eliminate photo documentation requirement, due to cost, difficulty of submitting with report, and questionable value in showing true condition of site. Also, correct the typo (10 pieces should be 100 pieces, in accordance with URTA standards for “optimal”.
C.10.d (ii-v)	Annual Reports	Requirements for reporting on existing laws related to trash is vague, overly broad, and difficult to achieve.	Restrict to reporting on any new laws or ordinances created by Permittees that are relevant to trash reduction.
<b>Provision C.13: Copper Controls</b>			
C.13.a(ii)	Copper Materials in Construction	Construction activities can be handled with a SWPPP under C.3 and C.6. Post-construction activities cannot be reasonably controlled	Eliminate reporting requirements for post-construction
C.13.b(ii)	Copper discharge from pools	This is redundant with C.3 provisions	Eliminate requirement
C.13.d(ii)	Industrial Source	This is redundant with C.4 provisions	Eliminate requirement